

EXHIBIT 85

**DECLARATION UNDER PENALTY OF PERJURY
PURSUANT TO 28 U.S.C. § 1746
AND/OR
SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW**

1. My name is Nicolas Winbush. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of Cobb County in Georgia and my residence address is [REDACTED]
[REDACTED], Atlanta, GA 30339.
3. My polling location is NFL OFFICEWORKS, INC.-VG03, 2865 LOG CABIN DR., ATLANTA, GA, 30339.
4. For the 2018 Georgia General Election, I requested an absentee ballot and I never received it. I was then forced to cast a provisional ballot instead of a regular ballot at the polling place for my residence address.
 - a. My wife and I requested absentee ballots. My wife completed and returned the absentee ballot. I did not return my absentee ballot so I went to go vote in person on Election Day, November 6, 2018, at my polling location, NFL Officeworks.
 - b. Once I arrived to the front of the line, I gave his ID to the poll worker. The poll worker made a phone call, I believe to the Cobb County Board of Elections or the Secretary of State's office.
 - c. From what I heard of the partial phone conversation, it seemed like the poll worker called to get instruction on how to handle voters with

absentee ballots at polling places. The call was taking longer than expected so I left my license with the poll worker in order to run an errand. After I returned to the polling place about 20 minutes later, the poll worker told me I could vote provisionally.

- d.** I voted provisionally and was given a receipt after submitting his ballot. Afterwards, I called the phone number on the receipt to check on my provisional ballot. I was told I had to go in person to Cobb County Board of Elections in order to get a status on my provisional ballot. I currently do not know the status of my provisional ballot.
- e.** I was prevented from casting a regular ballot at NFL Officeworks, and was not informed of the option to cancel the absentee ballot that I never received and vote a regular ballot. Instead, I was forced to cast a provisional ballot.

5. I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.

6. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.

7. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 15th day of November, 2018.



Nicolas Winbush

Sworn to and subscribed before me
This the 15th day of November, 2018.



Marian D. Scott
Notary Public

